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By. \_\_\_\_\_

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July 14, 2000

  
**Bobby L. Harnage**  
National President  
**Rita R. Mason**  
National Secretary-Treasurer  
**Kitty A. Peddicord**  
Director, Women's/  
Fair Practices Departments



Mr. John H. Thompson  
Associate Director of Decennial Census  
Bureau of the Census  
Suitland Federal Center  
Suitland and Silver Hill Road  
Building 2, Room 3586  
Suitland, MD 20233

Dear Mr. Thompson:

We are writing in response to a notice in the June 14, 2000 Federal Register from the U.S. Department of Commerce of a proposed rule concerning the release of population data from the 2000 decennial census. Our comments are consistent with those offered by the Leadership Conference on Civil Rights and other organizations.

We strongly support the Secretary of Commerce's determination that experts at the Bureau of the Census are most qualified to decide whether to release statistically correct population totals to the states, in accordance with the requirements of 13 U.S.C. §141(c).

The Census Bureau first used scientific measurements in 1940 to determine that people of color are missed by the census at far higher rates than the population as a whole. Evaluations of each subsequent census through 1980 revealed that this 'differential undercount' persisted despite improvements in the accuracy of the count for all population groups. Over time, refined measurement tools also revealed a similarly disproportionate undercount of poor people in both urban and rural areas, and of children. It became clear in 1990 that despite the Census Bureau's hard work, traditional counting methods alone could not reduce this historically unequal outcome. The 1990 census not only was the first to be less accurate than the one before it, the differential undercount of racial minorities was the highest ever recorded by the Census Bureau.

Such a bias in the constitutionally mandated enumeration process is an intolerable condition that the Census Bureau has worked for decades to overcome. Fortunately, experts in statistics and related fields have developed ways to correct inevitable flaws resulting from a direct counting effort, through sampling and estimation. Using the most robust of these methods -- Dual Systems Estimation (DSE) - the Census Bureau can compare a scientifically drawn sample of the population with the initial census count to produce more accurate and reliable population data. The Bureau, with the advice of expert panels convened by the National Academy of Sciences and other knowledgeable scientists, is now implementing such a process, known as the Accuracy and

Coverage Evaluation (A.C.E.) program. On June 12, Census Bureau Director Kenneth Prewitt transmitted to then-Secretary of Commerce William Daley a statement setting forth the Bureau's preliminary determinations that it can produce statistically corrected population totals within the time frame required by law, and that the corrected data will be more accurate than numbers derived from direct counting methods alone.

After reviewing and adopting the conclusions of the director's feasibility statement, the Commerce Secretary issued the proposed rule delegating to the Census Bureau Director the sole authority to decide whether to release statistically corrected data. The director will make that decision after receiving a report and recommendations from a committee of senior Census Bureau professionals who, collectively, have spent many years exploring ways to increase the accuracy of the census.

The proposed delegation of authority removes any opportunity, whether real or perceived, for the deft hands of politics to influence what clearly should be a decision based solely on scientific considerations. The director has publicly set forth the criteria that will guide the Census Bureau's determination as to whether statistically corrected data most accurately reflects the composition and distribution of the U.S. population. If the Bureau's senior professionals are satisfied that the criteria have been met, then the decision to report the corrected data to the states can be made as a matter of course.

We fully support this effort to ensure a fair and unbiased process for making such a vital decision. We support the Commerce Department's proposed rule and urge its adoption without material revision. Thank you for considering our views.

Sincerely,

A handwritten signature in black ink, appearing to read "Bobby L. Harnage, Sr.", written in a cursive style.

Bobby L. Harnage, Sr.  
National President

Cc: NEC